

DC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NOV 29 2005

Mr. Dennis Merida
Division Administrator
Federal Highway Administration
840 Bear Tavern Road, Suite 310
West Trenton, New Jersey 08628

Dear Mr. Merida:

The Environmental Protection Agency (EPA) has reviewed the Federal Highway Administration's (FHWA's) draft environmental assessment (EA) for the Route 27 - Wood Avenue Intersection Improvement, located in the Townships of Woodbridge and Edison, New Jersey.

The EA states that the project is needed because the current Route 27 - Wood Avenue intersection experiences severe traffic congestion due, in part, to the construction of the Metropark rail station parking garage, which doubled the amount of available parking in the area. Only alternative 1B is fully evaluated in the EA, which consists of a grade separated interchange with two-direction reverse loop ramp, a signalized intersection with Route 27 and Wood Avenue. Though the EA provided brief descriptions of the other considered alternatives and the reason for their elimination, we believe that having a range of alternatives to fully examine, even if it's just two, makes for a true alternatives analysis. Given the different constraints of the project area, a comparative analysis of alternatives would have made for a more meaningful document. An advantage to having a range of alternatives proposed for evaluation is that this comparison can sometimes highlight further avoidance and minimization options and innovative designs.

The EA contains some puzzling statements that the project sponsors may want to clarify. In the discussion of surface water quality, on page V-33, the EA cites an unnamed 1990 study and states that "...pollutant loadings are not dependent on average daily traffic. It was concluded that ADT should only be used to distinguish between urban and rural highways. The key factor in highway runoff pollutant loadings is impervious surface area." We strongly disagree with that statement. This section seems to imply that the amount of impervious surface area influences the amount of pollution more so than the actual source of the pollution, which are the vehicles. The volume of vehicles traveling on a roadway has a direct correlation influencing the amount and type of pollution found in runoff that can enter surface waters. The impervious surface statement contradicts most other studies of surface water pollution and sources. We suggest that FHWA correct this statement or demonstrate how this has any reference to the current project.

Additionally, the EA mischaracterizes the definition of cumulative impacts and contains several contradictory statements. On page V-13, the EA states that there are no other land development projects that would result in any cumulative or indirect impacts. However, on page(s) II-2, IV-1 to IV-2 (the section entitled "Other proposed actions in the vicinity of the Route 27 and Wood Avenue Intersection"), and V-11, the EA goes into detail regarding both proposed land development and road projects in the vicinity of the intersection. The very definition of cumulative effects is other past, present, and reasonably foreseeable projects that would have an effect on the resources that are also impacted by the proposed project. Therefore, the question is not whether these other projects have an effect on this intersection project, but rather that all of these projects, including this one, have an effect cumulatively on the resources in question. On page V-39, the EA states that there are or would be no substantial cumulative impacts to water quality, wetlands, and floodplains. We disagree with these statements as well. The area is fairly well developed, with the EA admitting that very little natural environment remains. Therefore, we would consider that the cumulative effects on these resources have been substantial. With this in mind, and the project sponsor's past history of incorrectly defining or not conducting a cumulative effects analysis, we strongly recommend that either the EA is revised or that the Finding of No Significant Impact contains the correct definition of cumulative effects and a complete and accurate analysis of those effects.

In order to assist the project sponsors in beginning this evaluation, the following resources should be examined; wetlands, Coppermine Brook, water quality, floodplains, traffic and circulation, cultural and historic resources, and hazardous materials and waste disposal. These are the ones that are most apparent of needing a cumulative effects analysis. However, other resource areas may need examination as well. The project sponsors will have to determine the temporal boundaries, but certainly the planned and most recent developments that have affected these resources would be a start. The particular resource determines the geographic bounds for a cumulative effects analysis; however, they may and can be outside of the limited study area.

We have concerns with the relocation of Coppermine Brook and some recommendations for the redesign. First, the proposed water quality basin(s) that will be adjacent to the realigned Coppermine Brook should meet New Jersey Department of Environmental Protection standards and should be capable of removing 80% of total suspended solids before discharging stormwater to Coppermine Brook. An evaluation of the current stream channel flow rate and morphology should be done so that the redesigned channel is comparable or better than the existing conditions. The new channel should neither impede nor increase flows, and should in fact be designed in order to reduce the flooding that has been a problem through this area, due in part to past actions limiting the streams ability to convey stormwater flows. Additionally, the project sponsors should examine Green Highway techniques to use in the design of the relocated Coppermine Brook. For

example, the use of rip-rap should be minimized, the streambed should be mud and silt, not concrete, and the culvert should be sized accordingly. The intent of Green Highways is to leave the resource better than when it was found. We would appreciate seeing that philosophy applied to this aspect of the project.

Thank you for the opportunity to comment on this EA. If you have any questions or would like to set up a meeting to discuss these comments and recommendations, please contact David Carlson of my staff at (212)-637-3502.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Grace Musumeci".

Grace Musumeci, Chief
Environmental Review Section
Strategic Planning and Multi-Media Programs Branch